

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION**

Emily Doe,

Plaintiff,

vs.

American University of Antigua Inc.,

Defendant.

C.A. No. 4:20-cv-04445-JD

**DEFENDANT'S MOTION TO DISMISS  
PLAINTIFF'S COMPLAINT**

Defendant American University of Antigua Inc. (“Defendant”), by and through undersigned counsel, respectfully moves for an Order dismissing Plaintiff Emily Doe’s (“Plaintiff”) Complaint (Dkt No. 1) for lack of personal jurisdiction and on *forum non conveniens* grounds, pursuant to Federal Rules of Civil Procedure 12(b)(2) and (3).

Defendant submits the accompanying Memorandum of Law in support of its Motion. Defendant respectfully requests that the Court dismiss all of Plaintiff’s claims without the opportunity to amend.

[Signature Page to Follow]

Respectfully submitted,

/s/ Angus H. Macaulay

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February 22, 2021  
Columbia, South Carolina